

EXHIBIT 2

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

MEMPHIS A. PHILLIP RANDOLPH
INSTITUTE, et al.,

Plaintiffs,

Civil No. 3:20-cv-0374

v.

TRE HARGETT, et al.,

JUDGE RICHARDSON
MAGISTRATE JUDGE FRENSELEY

Defendants.

**DECLARATION OF GLORIA JEAN SWEET-LOVE IN SUPPORT OF PLAINTIFFS'
RESPONSE TO DEFENDANTS' EMERGENCY MOTION FOR A STAY PENDING
APPEAL
(Pursuant to 28 U.S.C. § 1746)**

I, Gloria Jean Sweet-Love, am over the age of 18 and fully competent to make the following declaration. The facts in this declaration are based on my personal knowledge and upon information available to me through the files and records of Tennessee State Conference of the NAACP ("Tennessee NAACP"). If called upon as a witness, I would testify to these facts. Under penalty of perjury, I declare and state the following:

1. I am the president of Tennessee NAACP. I have served as president of the Tennessee NAACP since January 1996.
2. In this role, I am responsible for the Tennessee NAACP's operations. I oversee the regional divisions, the branches, and the college chapters and youth councils ("local units"). I am responsible for setting the direction, determining the priorities, planning, and executing civic engagement activities of all the local units.

3. Based on my knowledge and experience I am familiar with Tennessee NAACP's voter identification, mobilization, and engagement activities.

4. Tennessee NAACP has spoken with over 1,000 voters since the Court's September 9, 2020 Order granting Plaintiffs' Motion for Preliminary Injunction with respect to the first-time voter restriction. It would be essentially impossible to recontact each of these voters and inform them that the Court's order has been stayed. Thus, a stay would cause significant confusion among our members and the communities we engage.

5. Tennessee NAACP has incorporated the court's September 9 Order into its meeting announcements about absentee voting, including announcements made at voter registration drives and virtual townhalls.

6. During the phone banking campaigns Tennessee NAACP has conducted since the court's September 9 Order, we have directed our volunteers to inform voters who are eligible to and wish to vote absentee of their right to vote absentee, even if it is their first time voting in the state or their county.

7. Overall, Tennessee NAACP volunteers have spoken with over 1,000 voters since the court's September 9 order, including some who indicate that they intend to or may vote by mail.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed this 7th day of October, 2020.



Gloria Jean Sweet-Love

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